Re SAI#FL200601040763C, RIN 11010-AD30, Alternate Energy-Related Uses on the Outer Continental Shelf

Please accept our comments relative to the request by Mineral Management Service for information concerning the alternate use of existing facilities for offshore aquaculture.

The Division of Aquaculture in the Florida Department of Agriculture and Consumer Services supports the concept of allowing offshore aquaculture as an alternate use of existing facilities on the U.S. Outer Continental Shelf. Some aspects of the aquaculture industry in the U.S. are still in the development stages and access to offshore structures would provide additional and more expeditious means to generate economic and environmental impact data on offshore aquaculture in the Gulf of Mexico. There has been some applied research done in this area and the division recommends the following references.

Bridger, C. J. (ed). 2004. Efforts to Develop a Responsible Offshore Aquaculture Industry in the Gulf of Mexico: A Compendium of Offshore Aquaculture Consortium Research. Mississippi-Alabama Sea Grant Consortium, Ocean Springs, Mississippi.

Bridger, C.J. and B.A. Costa-Pierce (ed). 2003. Open Ocean Aquaculture: From Research to Commercial Reality. The World Aquaculture Society, Baton Rouge, Louisiana.

Reggio, V.C., Jr. 1996. Mariculture Associated with Oil and Gas Structures: A Compendium. 14th Information Transfer Meeting, Mariculture Sessions, New Orleans, Louisiana, November 17, 1994. U.S. Department of the Interior, Mineral Management Service, Gulf of Mexico OCS Region. OCS Study MMS 96-0050.

Stickney, R.R. and J.P. McVey. 2002. Responsible Marine Aquaculture. CABI Publishing, New York, New York.

Waldemar Nelson International, Inc. 2001. Offshore Mariculture in the Gulf of Mexico: A Feasibility Report. Louisiana Sea Grant College Program, Louisiana State University, Baton Rouge, LA

The division also recommends to MMS they review for consideration: 1)Chapter 597, Florida Aquaculture Policy Act, Florida Statutes, and Chapter 5L-3, Aquaculture Best Management Practices, Florida Administrative Code, that provides for and regulates aquatic species cultured in the Exclusive Economic Zone (EEZ) and landed in Florida. EEZ producers would have to acquire an Aquaculture Certificate of Registration and abide by Best Management Practices that, in this instance, require acquisition and maintenance of federal licenses and permits from: U.S. Corps of Engineers, U.S. Environmental Protection Agency, U.S. Coast Guard, and National Marine Fisheries Service; and 2) 40 CFR, Parts 122, 125 and 451 where EPA has established a National Pollutant Discharge Elimination System permit for Concentrated Aquatic Animal

Production and national aquaculture effluent limitation guidelines for aquaculture production systems. These sources of information clearly provide guidelines, rules, Best Management Practices, and procedures on aquaculture and its regulation. In addition, EPA compiled environmental impact information for inshore marine net pens for the purpose of developing the new effluent limitation guidelines. That information can be found in an EPA report entitled, "Technical Development Document for the Final Effluent Limitations Guidelines and New Source Performance Standards for the Concentrated Aquatic Animal Production Point Source Category (August 2004)." The report is available in the .pdf format at http://www.epa.gov/guide/aquaculture/tdd/final.htm.

Current environmental monitoring of offshore sea cages in Hawaii and Puerto Rican state or territorial waters by the Hawaiian and Puerto Rican Sea Grant Programs have yielded no impact on water quality beyond 30 meters from the sea cages and little to no benthic impact beyond the sea cage shadow. Given the data currently known, if MMS leases a site to a marine aquaculture facility requiring permits for navigation, water quality and species the probability that little, if any, adverse impact will occur is extremely low. Consequently, the division encourages the MMS to review the information and regulations already in place for aquaculture and consider allowing offshore aquaculture to use existing facilities. To do so would benefit our knowledge and our economy.